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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ZAINA DOUMAT, individually

Plaintiffs,

TARGET CORPORATIONS; DOES I-X, and
ROE CORPORATIONS I-X, inclusive

Defendants,

Case No.: 2:23-cv-01231-APG-DJA

**STIPULATION AND PROPOSED ORDER
TO EXTEND DISCOVERY DEADLINES
(SIXTH REQUEST)**

The Parties to this action, by and through their respective counsel of record, hereby stipulate to and request an extension of the discovery deadlines set forth in the current Discovery Plan and Scheduling Order (*see* Doc. No. 20).

The parties are in agreement that additional discovery is necessary prior to expert disclosures and have engaged in productive discussions regarding the completion of this discovery. The parties are agreeable and cooperative in both the scheduling and timing of further discovery and have determined that it is not feasible to have the required discovery completed within the currently scheduled discovery period, as outlined below. Therefore, the parties desire to extend all discovery deadlines in this matter by sixty (60) days.

Discovery Completed:

1. All parties have made their initial and supplemental disclosures pursuant to FRCP 26.
2. Plaintiff served Defendant with Interrogatories, Request for Admissions, and Requests for Production of Documents.

1 3. Defendant served Plaintiff with Interrogatories, Request for Admissions, and Request for
2 Production of Documents.

3 4. Defendant responded to Plaintiff's written discovery.

4 5. Plaintiff responded to Defendant's written discovery.

5 6. Defendant has provided Supplements 1-6 to its Initial FRCP Disclosure.

6 7. Deposition of Plaintiff.

7 8. Deposition of Plaintiff's husband, Samuel Shetayh.

8 9. Deposition of Defendants Target's current employee Frankie Romano.

9 10. Continued Deposition of Plaintiff.

10 11. Deposition of Target's FRCP 30(b)(6) representatives.

11 12. Deposition of percipient witness Christian Azar.

12 **Discovery that remains to be completed:**

13 1. Depositions of Defendants Target's current and former employees.

14 2. Defendant intends to conduct FRCP Medical Examination, which is currently scheduled
15 for November 18, 2024.

16 4. Deposition of Plaintiff's treating physicians.

17 5. Retention of experts.

18 6. Both parties need to depose the experts retained.

19 7. Gather recently obtained medical treatment records.

20 **Reasons Discovery Has Not Been Completed and Should be Extended:**

21 This is the parties' sixth request to extend discovery. Due to conflicting schedules,
22 Plaintiff's medical examination was not able to be set before November 18, 2024. Furthermore,
23 Plaintiff has recently undergone additional injections on November 1, 2024, and those records have
24 not yet been obtained. Both the medical examination and Plaintiff's recent medical records are
25 necessary to complete the expert disclosures in this case, currently due on December 27, 2024.

Furthermore, Plaintiff's medical expert is not able to provide a report for another sixty (60) days. Accordingly, additional time is required to complete expert disclosures.

As stated above, the parties have been agreeable and cooperative in efficiently planning and conducting discovery.

Furthermore, this request is timely pursuant to Local Rule 26-4 and the Scheduling Order entered in this case. The next deadline is December, 27, 2024, for the Initial Expert Disclosures, thus this request is timely. For all of these reasons the Parties respectively request a sixty-day (60) continuance.

4. PROPOSED SCHEDULE FOR PLEADINGS AND COMPLETING REMAINING

DISCOVERY:

Deadline	Current Date	Proposed Date
Amend Pleadings and Add Parties	January 31, 2024	Not Extended
Initial Disclosure of Experts	December 27, 2024	February 25, 2025
Disclosure of Rebuttal Experts	January 27, 2025	March 28, 2025
Discovery Cut-Off	February 27, 2025	April 28, 2025
Dispositive Motions	March 27, 2025	May 26, 2025
Joint Proposed Pre-trial Order	April 28, 2025	June 27, 2025¹

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¹ In the event dispositive motions are filed, this date will be stayed until thirty (30) days after a decision is rendered thereon.

IT IS SO STIPULATED.

DATED THIS 15th day of November, 2024

PERRY & WESTBROOK

/s/ Alan W. Westbrook

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ORDER

This 18th day of November, 2024.


UNITED STATES MAGISTRATE JUDGE